

# EXHIBIT 15



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through partnership

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December 1, 2022

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Re: *Russo, et al. v. Walgreen Co.*, Case No. 1:17-cv-02246

Dear Counsel:

We have reviewed Plaintiffs' Motion for Class Certification and supporting Memorandum (collectively, the Motion) filed on November 17, 2022, and notice that Plaintiffs are not seeking class certification in relation to many of the claims Plaintiffs pled in the Fourth Amended Consolidated Class Action Complaint (Dkt. No. 477). Specifically, the Motion does not cover the following claims:

1. Count I – Common law fraud;
2. Count II – Unjust enrichment on behalf of Ms. Russo and Mr. Gonzales (Florida, New Mexico, Wisconsin, and South Carolina are not states in which an unjust enrichment class is being sought) (*see* Memo at 29);
3. Count III – Illinois Consumer Fraud and Deceptive Business Practices Act on behalf of Ms. Russo, Ms. Bullard, Mr. Gonzales, International Brotherhood of Electrical Workers Local 38 Health and Welfare Fund (IBEW), and International Union of Operating Engineers Local 295-295C Welfare Fund (IUOE) (only proposed Class Representative

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- identified in the Motion with regard to Illinois is Steamfitters Fund Local 439 (Steamfitters)) (*See* Memo at 3, n.2);
4. Count IV – Arizona Consumer Fraud Act on behalf of IBEW (only proposed Class Representatives identified in the Motion with regard to Arizona are Mr. Gonzales and Steamfitters) (*See* Memo at 3, n.2);
  5. Count VIII – Colorado Consumer Protection Act;
  6. Count XII – Georgia Uniform Deceptive Trade Practices Act;
  7. Count XIII – Georgia Fair Business Practices Act;
  8. Count XIV – Louisiana Unfair Trade Practices and Consumer Protection Law;
  9. Count XVI – Minnesota Prevention of Consumer Fraud Act;
  10. Count XVII – Minnesota Uniform Deceptive Trade Practices Act;
  11. Count XIX – Nevada Deceptive Trade Practices Act;
  12. Count XX – New Mexico Unfair Practices Act;
  13. Count XXV – South Carolina Unfair Trade Practices Act;
  14. Count XXVI – Texas Deceptive Trade Practices Consumer Protection Act; and
  15. Count XXVII – Wisconsin Deceptive Trade Practices Act on behalf of IBEW (only proposed Class Representative identified in the Motion with regard to Wisconsin is Mr. Gonzales) (*See* Memo at 3, n.2).

Please confirm by Thursday, December 8, 2022, whether Plaintiffs intend to voluntarily dismiss some or all of these claims and, if so, please provide a draft Stipulation of Dismissal for our consideration.

Sincerely,



Michael S. Leib

cc: Rick Robinson (Reed Smith)  
Selina Coleman (Reed Smith)  
Jessica Christensen (Reed Smith)  
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